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**Not for service*

July 24, 2025

BY ECF

Hon. Jennifer L. Rochon, U.S.D.J.
United States District Court, Southern District of New York
Daniel Patrick Moynihan Courthouse, 500 Pearl Street
New York, New York 10007

Re: Guerrero-Tabares v. City of New York, et. al., 24-cv-6361 (JLR)

Your Honor:

I write to ask that the Court extend the current August 12, 2025 deadline by which Plaintiff must file any application for attorney's fees, costs, and expenses by around an additional 90 days, until October 16, 2025. (A 90-day extension would fall on the weekend and Monday, October 15th is a holiday). Counsel for Defendants joins in this request.

By way of background, Plaintiff accepted an Offer of Judgment pursuant to Fed.R.Civ.P. 68 to resolve all claims in this matter aside from Plaintiff's claims for attorney's fees, costs, and expenses. The Court then granted a previous application by the parties to extend the deadline by which Plaintiff must file any application for attorney's fees, costs, and expenses, until 90 days after the Court entered that judgement, so that the parties can attempt to resolve the remaining claims for attorney's fees, costs, and expenses without the need for intervention by the Court.

A few days ago, Plaintiff's counsel learned that Joseph A. Hiraoka, Esq., the Law Department attorney who has been assigned to the case, is no longer working on the case. This morning, Plaintiff's counsel learned the identity of the attorney who is now, newly assigned to the matter, Rachel Seligman, Esq.

Understandably, it will take some time for Ms. Seligman to get up to speed on the case and to engage with Plaintiff's counsel to negotiate over fees. The parties therefore make this application to extend the current deadline for Plaintiff to file any application for attorney's fees, costs, and expenses until October 16, 2025.

The parties thank Your Honor for the Court's attention to this matter.

Respectfully submitted,

/S/

Gideon Orion Oliver